

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                                  )  
                                  )  
v.                              )                                 Docket No. 20-cr-10012-IT  
                                  )  
                                  )  
PAUL BATEMAN              )

**ASSENTED-TO MOTION FOR RULE 11 HEARING**

The Defendant, Paul Bateman, respectfully moves this court to schedule a Rule 11 hearing, and to cancel the initial pretrial conference presently set for October 4, 2023. The parties are available for a Rule 11 hearing on November 6, 2023, if convenient for the Court.

As grounds, undersigned counsel has discussed the case with Mr. Bateman, and understands that Mr. Bateman wishes to tender a change of plea. The parties request that the Rule 11 hearing be scheduled in approximately 30 days, on November 6, 2023, to permit them to negotiate the terms of a possible plea agreement and, if necessary, to obtain the required reviews and approvals. Counsel states that this Court previously excluded the period through and including November 13, 2023 from the speedy trial clock, pursuant to the Speedy Trial Act, and in the interests of justice, Mr. Bateman would assent to an order for an additional period of excludable delay should this Court schedule a Rule 11 hearing after November 13, 2023.

Defense counsel has conferred with counsel for the government, Anne Paruti, and understands that the government assents to this motion.

Respectfully submitted,  
PAUL BATEMAN  
By His Attorney,

Dated: 10/3/23

/s/ Sandra Gant  
Sandra Gant, B.B.O.# 680122  
Federal Public Defender Office

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CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on October 3, 2023.

/s/ Sandra Gant  
Sandra Gant